

### **REMARKS**

Favorable reconsideration and allowance of this application are requested.

By way of the amendment instructions above, claim 1 has been amended so as to further clarify the same. Specifically, applicants have defined in claim 1 that a portion LI from the wash liquid/filtrate is taken between the digester and the washer (12) of the delignification stage. Such language therefore covers the typical procedures wherein the portion LI is separated from the filtrate transported from the washer (12) of the oxygen delignification stage to the brown stock washer (8).

Furthermore, in step c) of amended claim 1 applicants have defined that the fraction CC is returned to at least one of the following: (i) substantially to the same point in the process from which the portion LI of the filtrate was extracted according to step (a), (ii) to the brown stock washer (8) or (iii) to the washer (12) following the delignification stage (10). Claim 16 thus makes it clear that at least part of the fraction CC is passed to a washer or press of a bleaching stage which is not inconsistent with the language employed in the amended version of claim 1.

Thus, the Examiner will observe that the amendments to claim 1 have been presented so as to clarify the locations where the filtrates are recycled and thereby to address the Examiner's statements with respect to the apparent breadth of the prior version of claim 1. As will become evident from the following discussion, amended claim 1 and the claims dependent therefore are in condition for allowance.

The only issue remaining to be resolved in this application is the rejection advanced against previous claims 1-19 under 35 USC §103(a) as allegedly being unpatentable over WO 95/04188 or WO 94/12720 in view of the "admitted prior art".

In order to more fully understand the "admitted prior art", it may be helpful if more detailed comments with regard to the Tuomi reference were initially considered. In this regard, applicants note that Tuomi discusses washers from where one is able to withdraw several filtrates. However, the washer of Tuomi has two or three stages. It should be understood that, if a washer is a single stage washer a certain portion of liquid is used only once within the washer. On the other hand, in a two-stage washer the liquid is used twice, whereas in a three-stage washer the liquid is used three times. In other words, in the washer of Tuomi the washing liquid is recirculated countercurrently within the same washer several times, at least once. In this regard, the Examiner's attention is directed to the sketch accompanying the applicants' amendment dated October 1, 2002 which depicts a liquid circulation scheme of Tuomi in a more easily understandable form. In the process of Tuomi and in the present FIGURE 1 (the "admitted prior art" employed by the Examiner), the washing can be really performed in several stages in one washer and a filtrate from each stage is recovered, but after that the filtrates recovered are not treated in a separate separation device. Steps b) - d) of pending claim 1 herein are thus not disclosed by these references in which no portion LI or fractions CC and CD are separated from the filtrates, but the filtrates as such (without any further treatment) are passed to the points they are used.

Applicants note that in Figure 3 of WO 95/04188, the washer 10 and the filtrate 3 discharged from this washer are located after the process stage 9 which immediately follows the delignification and the delignification washer 17. In this reference, a part (5) of the filtrate 3 is taken to evaporation, but such a method is not in accordance with the present invention. The COD level of oxygen delignification does not decrease in the process described by WO 95/04188.

The crux of the disclosure in WO 94/12720 is concentrated on describing an extra recovery process (11), in which counter-currently circulated effluents from oxygen

delignification and bleaching are treated. A characterizing feature of the process of WO 94/12720 is that brown stock (unbleached pulp) washing (2) ends up with a wash press (3), the filtrate of which flows counter-currently through the brown stock washing and screening (2) to the digestion (1). In the process of WO 94/12720, liquid from the washing of a metal removal stage (6) before the oxygen delignification (7) is evaporated (11) and condensate from the evaporation is supplied as washing liquid (4A, 4) to the wash press (3) and as washing liquid (10) to the last stages (9) of the bleaching sequence. A basic difference between the WO 94/12720 and the present invention is that the present invention relates to a process in which clean washing liquid is brought to the end of the process and transferred counter-currently relative to the flow direction of the fiber suspension through several washing stages at least partly to the digester and from there further to chemical recovery CR as defined in claim 1. In WO 94/12720 washing liquid does not flow countercurrently from the washer (8) of the oxygen delignification (7) as far as to the digester, but the washing liquid (10) brought to the bleaching (9) is partly recovered in flow 6D or recirculated from the Z washing stage 91 (Fig. 2) back to the EDTA stage (6) in flow (5) (page 10, lines 25-29). Another washing liquid (i.e., flow 4) is introduced to the wash press (3). On the contrary, in the present invention washing liquid flows at least partly through the whole process to the digester -- i.e. in the applicants' process, the filtrate coming from the washer 12 downstream of the oxygen delignification stage 10 is directed to the brown stock washer 8. In WO 94/12720 the whole flow of washing liquid (6D) from the washing stage 6C (Fig. 2) is directed to evaporation.

In view of the amendments and remarks above, applicants suggest that all claims now pending in this application are in condition for allowance. Official Notice to that effect is solicited.

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An early and favorable reply on the merits is awaited.

Respectfully submitted,

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